REMARKS

Applicant hereby amends claims 1, 3, 4, 6-9, 12, 17, 19, 21, 25, 29, 30, and 32 and cancels claim 2. Claims 26-28 were previously cancelled. Claims 1, 3-25 and 29-41 remain pending in the application with claims 1, 29, 30, 32, 33, and 41 being in independent form.

In an Office Action mailed July 31, 2009,[1] the Examiner objected to the Abstract. Office Action at 2. Applicant has amended the Abstract to remove the phrase "Elected for publication: Fig. 6" at the Examiner's recommendation. Thus, Applicant respectfully requests that the Examiner withdraw the objection to the Abstract.

In the Office Action, the Examiner rejected claims 1-25 and 29-41 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2003/0085884 to Pettersson et al. ("*Pettersson*"). Office Action at 2. Claim 2 has been cancelled. Applicant respectfully traverses the rejection of claims 1, 3-25, and 29-41. In order to establish anticipation under 35 U.S.C. § 102, the Office Action must show that each and every element as set forth in the claim is found, either expressly or inherently, in *Pettersson*. *See* M.P.E.P. § 2131. *Pettersson*, however, does not disclose each and every element of Applicant's claims.

Applicant's claim 1, as amended, recites a method of coding positions in two dimensions on a surface including the following:

> generating a first data structure in which each of said rotations is represented by said first shift information and first

[1] The Office Action may contain statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

definition data, said first definition data including a first image definition that represents said first cyclic number sequence using at least one code block image;

transferring the first data structure to a printer; and

enabling the printer to convert the first data structure into a printable image.

Pettersson does not disclose or suggest at least these steps of amended claim 1. *Pettersson* discloses position coding in one or two dimensions where a cyclic main number sequence is used to code positions. *Pettersson* at [0026], [0028], and [0088] - [0142]. *Pettersson* also discloses decoding position code using difference number sequences. *Pettersson* at [0143]-[0180]. Further, *Pettersson* discloses that position code can be printed out by a printer using normal printing techniques. *Pettersson* at [0201]. *Pettersson*, however, does not disclose or suggest at least the claimed generation of a first data structure, that this first data structure be transferred to a printer, and/or enabling the printer to convert the first data structure into a printable image, as is recited in claim 1, much less that the first data structure includes the below-discussed features recited in claim 1. For example, *Pettersson* does not disclose or suggest a first data structure that includes (1) first shift information and (2) first definition data, the first definition data including a first image definition that represents a first cyclic number sequence using at least one code block image, as is recited in claim 1. Nor does the Office Action point out where such features are disclosed or suggested in *Pettersson*.

Pettersson thus fails to disclose each and every element of Applicant's amended independent claim 1, and therefore does not anticipate this claim. Independent claim 1

should therefore be allowable. Claims 3-25 depend from independent claim 1 and also should be allowable at least by virtue of their dependence from base claim 1.

Although different in scope from claim 1, amended claim 29 includes similar recitations to claim 1. Thus, for similar reasons to those discussed above in connection with claim 1, *Pettersson* fails to anticipate claim 29.

Next, *Pettersson* does not anticipate claim 30 because *Pettersson* does not disclose all of the features of claim 30. Independent claim 30 differs from claims 1 and 29 but includes the features of retrieving definition data including a first image definition that represents a cyclic number sequence using at least one code block image and generating a printable image of a coding pattern based on shift information and the definition data. As discussed above in connection with claim 1, *Pettersson* merely discloses that position code can be printed out by a printer using normal printing techniques. *Pettersson* at [0201]. *Pettersson*, however, does not disclose or suggest retrieving definition data or generating a printable image of a coding pattern based on shift information and definition data, much less the claimed "definition data," which includes a first image definition that represents a cyclic number sequence using at least one code block image. Nor does the Office Action point out where such features are disclosed or suggested in *Pettersson*. *Pettersson* thus fails to disclose each and every element of Applicant's amended independent claim 30, and therefore does not anticipate this claim. Independent claim 30 should therefore be allowable. Claim 31 depends from independent claim 30 and also should be allowable at least by virtue of its dependence from base claim 30.

Although different in scope from claim 30, independent claim 32 includes similar recitations to claim 30. Thus, for similar reasons to those discussed above in connection with claim 30, *Pettersson* fails to anticipate claim 32.

Pettersson also does not anticipate independent claim 33 because *Pettersson* does not disclose all of the features of claim 33. Independent claim 33 recites the features of

> retrieving, for each number sequence in each dimension, at least one code block image of the code symbols that represent the number sequence;
>
> merging the thus-retrieved code block images to form a first and a second composite image corresponding to said first dimension and said second dimension, respectively; and
>
> combining said first and second composite images to form a printable image.

Pettersson, however, does not disclose or suggest at least these features because, for example, *Pettersson* does not disclose or suggest the use of code block images that represent number sequences, much less "retrieving" at least one code block image, merging retrieved code block images to form first and second composite images corresponding to first and second dimensions, and combining the composite images to form a printable image, as is recited in claim 33. Nor does the Office Action point out where such features are disclosed or suggested in *Pettersson*.

Pettersson thus fails to disclose each and every element of Applicant's independent claim 33, and therefore does not anticipate this claim. Independent claim 33 should therefore be allowable. Claim 34-40 depend from independent claim 33 and also should be allowable at least by virtue of their dependence from base claim 33.

Although different in scope from claim 33, independent claim 41 includes similar recitations to claim 33. Thus, for similar reasons to those discussed above in connection with claim 33, *Pettersson* fails to anticipate claim 41.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 102(e), and allowance of claims 1, 3-25 and 29-41.

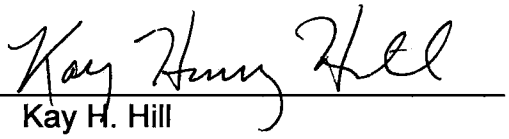
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: December 30, 2009

By: 

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Attachment: Replacement Abstract